

EXHIBIT B

PLAN OF ALLOCATION

For each Class Member who had an Active Account at any time during the period November 13, 2014 through September 30, 2021, the Net Settlement Amount will generally be distributed on a pro-rata basis, based on the average account balance for each Class Members' claim divided by the total average account balances for all Class Members' claims, multiplied by the Net Settlement Amount, as follows:

Step 1 – Allocate the Net Settlement Amount Between Period 1 and Period 2. Ninety percent (90%) of the Net Settlement Amount will be allocated to Class Members with Active Accounts in the Plan at any time between November 13, 2014 and December 31, 2018 ("Period 1"), while the remaining ten percent (10%) of the Net Settlement Amount will be allocated to Class Members with Active Accounts in the Plan at any time between January 1, 2019 and September 30, 2021 ("Period 2").

Step 2 – Calculate Settlement Payments for Period 1 Class Members. The Period 1 settlement payment for each Class Member with an Active Account during Period 1 ("Period 1 Class Members") will be calculated by dividing each Period 1 Class Member's average quarter-ending account balance during Period 1 by the total of all such average quarter-end balances for all Period 1 Class Members to arrive at each Period 1 Class Member's pro-rata settlement percentage. The pro-rata settlement percentage for each Period 1 Class Member will then be multiplied by an amount equal to ninety percent (90%) of the Net Settlement Amount to arrive at the Period 1 settlement payment for each Period 1 Class Member.

Step 3 – Calculate Settlement Payments for Period 2 Class Members. The Period 2 settlement payment for each Class Member with an Active Account during Period 2 ("Period 2 Class Members") will be calculated by dividing each Period 2 Class Member's average quarter-ending account balance during Period 2 by the total of all such average quarter-end balances for all Period 2 Class Members to arrive at each Period 2 Class Member's pro-rata settlement percentage. The pro-rata settlement percentage for each Period 2 Class Member will then be multiplied by an amount equal to ten percent (10%) of the Net Settlement Amount to arrive at the Period 2 settlement payment for each Period 2 Class Member.

Class Members who are both Period 1 and Period 2 Class Members will receive a settlement payment equal to the total of their Period 1 and Period 2 settlement payments.

Distributions will be made to eligible Class Members after all claims have been processed and after the Court has finally approved the Settlement. In no event will total payments made under this Plan of Allocation exceed the Net Settlement Amount. The Settlement Administrator shall have authority, in consultation with Class Counsel and Defense Counsel, to adjust the Plan of Allocation as may be needed to ensure payments made under the Plan of Allocation do not exceed the Net Settlement Amount.

Calculation of Settlement Recovery as Percentage of Estimated Damages

Estimated Class Damages	\$2,271,869
Settlement Fund, Gross	\$470,000
% Recovery, Gross	20.7%
Estimated Fees and Expenses	
Independent Fiduciary	\$15,000
Attorneys' Fees	\$141,000
Attorneys Expenses	\$10,000
Case Contribution Awards	\$22,500
Total Estimated Fees and Expenses	\$188, 500
Settlement Fund, Net	\$281,500
% Recovery, Net	12.4%